

Laura White  
(b)(6)/Privacy Act  
(b)(6)/Privacy Act  
(b)(6)/Privacy Act

February 27, 2018

To: U.S Environmental Protection Agency, Region 9  
Drinking Water Protection Section, Mail Code WTR-3-2  
75 Hawthorne Street  
San Francisco, CA, 94105  
Attention: Nancy Rumrill  
Sent by email to: [rumrill.nancy@epa.gov](mailto:rumrill.nancy@epa.gov)

RE: Comments regarding Gunnison Copper Project Class III Draft Underground Injection Control Permit

Dear Ms. Rumrill:

I am writing to provide my comments on the Draft Class III Underground Injection Control Permit (UIC) for Excelsior Mining's Gunnison Copper Project located in Cochise County, Arizona, near the town of Dagoon. I am a lifelong resident of this area and I believe sufficient information relative to the project has not been made available to me as a member of the public and a stakeholder. The following are my concerns:

1. Formation of the Area of Review (AOR)

There is no precedent for the permitting of any commercial-scale in-situ leaching operation anywhere in Region 9. Therefore, what factors went into the determination of the size of the AOR? Why is the AOR virtually the same as the area of hydraulic control rather than a much larger area that would encompass the area of potential impacts? The determination of the AOR should be a transparent process and the factors used in that determination should be in the public interest, not that of Excelsior.

2. Monitoring

Why are there no monitoring wells proposed in areas well beyond the AOR boundaries? I do not feel the monitoring wells proposed are adequate to detect the contamination of the wells of residents living in the area, or the contamination of water that could flow into larger aquifers that supply water to residents in the San Pedro Valley.

3. Cumulative Impacts Analysis

The Code of Federal Regulations, 40 CFR 144.33 (c)(3) requires that a cumulative impacts analysis be completed during EPA's review of the UIC permit application. Apparently no such analysis has been completed for the project. A comprehensive and detailed cumulative impacts analysis including cumulative effects on all natural and cultural resources and the human environment should be completed. It should include the potential of reactivation of Johnson Camp Mine as a foreseeable potential future action and include all potential uses of that site. The revised/supplemental draft UIC should then be re-noticed for a new 90 day public comment period.

4. Water quality parameters have not been made available to the public. These should be determined and those parameters as well as an explanation as to how they were determined should be included in the draft permit.

Due to the procedural and analytical inadequacies stated above, I request that the EPA rectify these inadequacies and re-notice the revised/supplemental draft UIC permit for at least a 90-day public comment period. Thank you for the opportunity to comment.

A handwritten signature in black ink that reads "Laura White". The script is cursive and fluid, with the first name "Laura" and last name "White" clearly distinguishable.

Laura White